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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JAMES MCHUGH,
Plaintiff,
vs.
MICHALE J. ASTRUE, Commissioner of
Social Security,
Defendant.

) Case No.: No. 06-3616 JL
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Plaintiff, by and through his attorney of record, and Defendants, by and through their attorneys of record, hereby stipulate, subject to the approval of the Court, to a 60-day extension of time for Plaintiff's counsel to file a brief in support of his Motion for Summary Judgment, in light of the following:

1. Plaintiff, James McHugh, retained counsel two days ago. His new counsel did not represent him at any point in the administrative process and is generally unfamiliar with his case.

2. Plaintiff's counsel has spoken with Shea Bond, Esq., defendant's counsel (via telephone messages) and she has indicated that she is agreeable to a 60 day -extension of time for counsel to prepare her brief.
 3. Plaintiff's counsel has not yet had a chance to review the transcript thoroughly. She will need the extension of time to meet with Plaintiff more, to review the transcript and to prepare the motion for summary judgment.
 4. Should the request be granted, Plaintiff's brief will be due on October 10, 2007, Defendant's reply brief on November 12, 2007 and Plaintiff's response on December 12, 2007.

Respectfully submitted,

Dated: August 9, 2007

/s/ Geri N. Kahn
GERI N. KAHN
Attorney for Plaintiff

Dated: August 9, 2007

/s/ Shea Lita Bond
SHEA LITA BOND
Special Assistant United States Attorney
Attorney for Defendants

Pursuant to stipulation, IT IS SO ORDERED.

Date: August 10, 2007

